

Exhibit 3

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

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LOURINZA BURWELL,

Plaintiff,

14 Civ. 10178 (JCB)

-against-

MASSACHUSETTS BAY COMMUTER
RAILROAD,

Defendant.
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PLAINTIFF'S DISCLOSURE
PURSUANT TO
FEDERAL RULE 26(a)(2)(C)

S I R S :

PLEASE TAKE NOTICE, that the following is Plaintiff's Disclosure pursuant to
Federal Rule of Civil Procedure 26(a)(2)(C):

**i) The subject matter on which each witness is expected to present evidence
under Federal Rule of Evidence 702, 703, or 705:**

ANSWER: Dr. Paul Blachman is expected to offer opinions regarding the examination of
plaintiff, history taken, review of medical records, including films and tests, findings,
causation, prognosis, diagnosis, recommendations, treatment, ability to work and follow-up.

Dr. Olarewaju Oladipo is expected to offer opinions regarding the examination
of plaintiff, history taken, review of medical records, including films and tests, findings,
causation, prognosis, diagnosis, recommendations, treatment, ability to work and follow-up.


**ii) A summary of the facts and opinions to which each witness is expected to
testify:**

ANSWER: Dr. Paul Blachman is expected to testify that based upon the examination of
plaintiff, history taken, review of medical records, including films and tests, that plaintiff
suffered injury to his shoulder on the job which prevented him from working full duty and
required additional treatment, consistent with medical records previously provided.

Dr. Olarewaju Oladipo is expected to testify that based upon the examination of plaintiff, history taken, review of medical records, including films and tests, that plaintiff suffered injury to his shoulder on the job which prevented him from working full duty and required additional treatment, consistent with medical records previously provided.

DATED: NASSAU, NEW YORK
January 21, 2015

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